



UNIVERSITY OF  
DENVER

**UNIVERSITY OF DENVER  
POLICY MANUAL  
UNIVERSITY RECORDS MANAGEMENT  
POLICY**

**Responsible Department:** Business and Financial Affairs  
& University Provost

**Recommended By:** Craig Woody, Vice Chancellor &  
Gregg Kvistad, Provost

**Approved by Board of Trustees:** March 17, 2009

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1.10.025

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April 1, 2009

## I. Introduction

The University of Denver (Colorado Seminary) (the "University") creates, manages, and uses a wide variety of records to conduct its affairs and support its educational mission, vision, values, and goals. Recognizing this, the University has instituted a University Records Management Program (URMP) and a set of policies governing the care and management of its records.

## II. Purpose and Scope

### A. Purpose

The purpose of the University Records Management Program is to assist the University in complying with external record-keeping requirements, managing University risk, and preserving the history of the University.

### B. Scope

URMP will provide recommendations, procedures, and tools for the effective and efficient management of University records. This includes assisting units with properly destroying outdated records, optimizing the use of storage space, and minimizing the cost of legal discovery. URMP will also assist in identifying, securing, and updating the vital records that play an integral role in the daily functioning of the University. URMP will not mandate the creation of records beyond those required for compliance with the law, but will assist units in managing whatever University records they create in the course of business.

## III. Policy Statement

### A. Definition of a University Record

A record at the University of Denver is evidence, regardless of its format, of the University's business transactions, activities, organization, or history that is created, received, recorded, or legally filed in the course of fulfilling the University's mission. URMP will work with units to publish records retention schedules defining what types of information are considered University records.

## **B. University Records Retention Schedule**

The University Records Retention Schedule will define how long records should be retained, the Office of Primary Responsibility for a record, and the ultimate disposition of the record: destruction or permanent retention in an archival environment. University Counsel will review schedules for compliance with all applicable statutory and regulatory requirements.

## **C. Content and Format of University Records**

1. University records may include, but are not limited to, student records, personnel records, financial records, contracts, grant materials, curricula, University publications, committee meeting minutes, memoranda, and correspondence. Records created or received by faculty in administrative and University committee capacities are University records.
2. Records may be physical or digital, and may take the form of email, voice mail, instant messages, paper documents, photographs, video, audio, drawings, or any media that houses a University record as defined in Section III.A.
3. Items that are not considered records include, but are not limited to, personal correspondence, reference/use copies of University records as defined in Section III.F, and non-University publications (magazines, journals).

## **D. Electronic University Records**

University records are increasingly being created and maintained in electronic format. The University Records Management Program is committed to managing the most authentic, sustainable, complete, and useful version of a University record, regardless of format.

## **E. Ownership of University Records**

University records are the property of the University of Denver and not of the University representatives who create them or to whom they are entrusted.

## **F. Office of Primary Responsibility**

The Office of Primary Responsibility (OPR) is the unit that is accountable for the official/master record. Other units may have access to reference or use copies of these records, or even have created the records, but final responsibility for retention and disposition lies with the OPR. Reference or use copies of records may be kept as long as required to serve business purposes, but no longer than the retention period of the official/master record. The OPR will be listed for each record type identified in the University Records Retention Schedule.

### **G. Disposal of University Records**

Official/master records are not to be destroyed or otherwise disposed of except in accordance with the procedures and records retention schedules established by URMP.

### **H. Legal Hold of University Records**

There are circumstances when the normal and routine destruction of records at the University must be temporarily suspended to meet legal, audit, or investigative requirements at the University. Records that pertain to ongoing litigation, or which are reasonably anticipated to relate to foreseeable legal action, must be preserved without alteration or destruction until the legal hold is released by the Office of University Counsel.

## **IV. Responsibility Structure**

### **A. Vice Chancellor of Business and Financial Affairs and the University Provost / Executive Compliance Committee**

Oversight of University records management is vested with the Vice Chancellor of Business and Financial Affairs and the University Provost. The Executive Compliance Committee provides guidance and supports the Vice Chancellor of Business and Financial Affairs and the University Provost regarding University records management issues.

### **B. University Records Management Program**

URMP is responsible for establishing records management policies, procedures, and retention schedules, and for the general day-to-day operations of the University-wide program. URMP provides information, advice, and training to units regarding best practices, standards, systems requirements and design, metadata, and workflow related to University records and University records systems.

### **C. University Personnel**

University Personnel, including all University officials such as faculty, visiting faculty, staff, student workers, volunteers and others whose scope of work may include management of records, are entrusted with the day-to-day management of records in their units according to University Records Management Policy and the University Records Retention Schedule.

### **D. University Special Collections and Archives**

The University Library's Special Collections and Archives unit oversees the long-term management of permanent University records wherever they reside and regardless of format.